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Michael K. Powell, Chairman  
Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, D. C. 20554

Comments on Rural Health Care Support Mechanism; WC Docket No. 02-60, FCC 02-122; (67 Federal Register 34653, May 15, 2002)

Dear Commissioners:

We submit the following comments regarding the Notice of Proposed Rulemaking for the Rural Health Care Support Mechanism (WC Docket No. 02-60, FCC 02-122; 67 Fed. Reg. 34653, May 15, 2002) on behalf of the Yukon-Kuskokwim Health Corporation (YKHC). YKHC has a keen interest in the Rural Health Care Support Mechanism and sincerely appreciates this opportunity to provide input on this important and complex program.

About YKHC: Delivering Health Care in a Vast, Remote, Sub-arctic environment.

YKHC is a non-profit Alaska Native health corporation based in Bethel, Alaska. Under agreements with the United States Indian Health Service (IHS) and pursuant to the Indian Self-Determination Act, YKHC provides a wide array of health services to about 20,000 Native and non-Native beneficiaries residing in the Yukon-Kuskokwim delta in Southwestern Alaska.

YKHC's service area covers approximately 6 million acres, an area larger than the state of Florida and roughly the size of Maine, Vermont, New Hampshire, and Massachusetts, combined. The 58 Alaska Native villages it serves are not only tiny and far-flung; 56 of them are also unconnected by road both to each other and to Bethel, the area's hub with a population of about 5,500. The infrequency of air service, and Alaska's harsh climate, means that in some villages and during some times of year, residents may have to wait a week or more to travel to Bethel, let alone to Anchorage, the State's only city having a population over 35,000.

To serve this vast and remote region, YKHC administers a 50-bed acute care regional hospital in Bethel; 48 village clinics; three sub-regional clinics; a substance and inhalant abuse treatment center; a 16-bed residential facility; a community mental health center; a 5-bed residential /diagnostic treatment system facility (treating at-risk adolescents); home health and various community outreach programs; an air ambulance transport service; and a training and certification program for community health aides who staff the village clinics. It has turned increasingly to the use of "telemedicine" to serve its patients, and is a founding member of the Distance Delivery Consortium, whose purpose is to provide desperately needed communications access to rural communities on the Y-K Delta.

YKHC's 48 village clinics are staffed only by "Community Health Aides." Community Health Aides are high school graduates with very limited health training, who live and work in the remote villages. They are supervised by mid-level practitioners (physicians assistants and nurse practitioners) in the sub-regional clinics, whose contact with them is generally limited to telephone, radio, or internet communication. The mid-level practitioners, in turn, are generally supervised by doctors stationed in the Bethel, again primarily by telephone, radio, or internet. Where specialty or other consultations are necessary, YKHC's physicians in turn confer with physicians employed by the Alaska Native Medical Center (ANMC) in Anchorage. ANMC is the only tertiary-care hospital in Alaska operated for the benefit of Alaska Natives and American Indians. Like YKHC's facilities, it is operated by an inter-tribal organization under agreements with the IHS pursuant to the Indian Self-Determination Act.

YKHC's region lacks the kind of infrastructure taken for granted even in other remote rural areas of the United States. For instance, twelve of YKHC's 48 village clinics do not have running water. Even in Bethel, 75% of the residences lack access to central piped water and sewage; they must rely on trucks to deliver their water and haul their sewage. These conditions typify rural Alaska, including regions served by tribal organizations other than YKHC. About 87% of Alaska has no road system and over half of Alaska Natives live in villages that can be accessed only by boat or plane. In two-thirds of the villages, the residents do not have running water or a sewer system at all.

=0C Because of the remoteness of most Alaskan communities, costs are exorbitant. Costs are terribly high even in Bethel; in the villages YKHC serves, they are astounding. In virtually every Alaskan village, prices are at least two to four times greater than those in the lower 48 states. For example, in 2000 a quart of milk cost about 87 cents in Billings, Montana, but \$2.70 in Akiak and \$4.95 in Noorvik. Health care costs are greatly increased due to housing costs for medical professionals, infrastructure and construction costs, utility costs, reduced professional efficiency and increased cost due to extensive travel, freight for all supplies and materials, recruitment costs, maintenance costs (travel costs for technicians), and lack of competition. One study shows that average prices are 50% higher for physician visits, 84% higher for hospital days and 239% higher for nursing home care in Alaska. In addition, village residents must pay for transportation from the village to Bethel or Anchorage when they need medical care from a physician.

Most health care in rural areas is provided by tribal health providers like YKHC, under agreements with the Indian Health Service. The services are scandalously underfunded by the government, with an annual funding gap for current IHS/tribal patients of \$1.2 billion nationally. Excluding the cost of necessary public health measures, the IHS/tribal health system fails to meet about 43% of the health care needs of Alaska Natives.

The health care facilities in rural Alaska are also chronically understaffed. There is no medical school in the state. Recruitment and retention of qualified health professionals is an uphill battle, even to "urban" Anchorage. Rural Alaskan communities are routinely designated as "Health Professional Shortage Areas" by the Public Health Service.

Under these circumstances, telecommunications and telemedicine are not just cost-saving measures, or things that may enhance the quality of care.

They are a necessary and integral component of getting the very most basic health care to the villages, a virtual life-line for village Alaska. Comments.

YKHC applauds the Commission's efforts to reevaluate the efficacy of the Rural Health Care Support Mechanism. While still in the process of analyzing some of the specific proposals described in the Notice of Rulemaking, YKHC offers some general comments and suggestions.

Because Indian and Alaska Native lands are among the most rural and undeveloped in the nation, and because Indian people have the poorest health status of any group in the country, YKHC also urges that the Commission consult with tribal governments and inter-tribal consortia like YKHC before proposing final rules on the Support Mechanism. Such consultation would be consistent with, if not compelled by, the Commission's June 23, 2000 Policy Statement on Establishing a Government-to-Government Relationship with Indian Tribes.

Paragraph numbers and headings below follow those used in the Notice of Proposed Rulemaking.

#### A. Eligible Health Care Providers

The Commission's interpretation of "health care provider" is too narrow.

Although the Notice indicates that the Commission is affirming that "eligible health care providers are limited to the seven categories enumerated in the statutory definition of 'health care provider,'" YKHC asks that the Commission re-visit that view. YKHC believes this interpretation, which excludes long-term and emergency care facilities, is needlessly narrow, and will frustrate the apparent purposes of the authorizing statute.

First, YKHC does not believe that the categories of "health care providers" appearing at 47 U.S.C. section 254(h)(7)(B) are the only categories of health care providers the Commission may include in the support mechanism. While the Commission clearly must take steps to enhance access for such providers under that section, we believe it enjoys authority to support additional categories of providers under the broader authority of 47 U.S.C. section 254(b)(3), which declares the general Universal Service principles. That is, section 254(h)(7) establishes the short-list of those health care providers who must be supported, but section 254 (b)(3) allows a longer list. YKHC believes the Commission has full authority to extend the discount to cover all types of health care services, so long as they are provided in a rural, non-profit environment.

Second, YKHC believes the Commission has interpreted the list of providers at section 254(7) more narrowly than Congress intended. Together, the listed facilities can provide virtually every type of health care service imaginable, including inpatient and outpatient care, preventive and other public health services, mental health and substance abuse evaluation and treatment, home care and other outreach services, as well as instruction for such services. Thus, it appears Congress intended to provide subsidies to promote the efficient delivery of higher quality health care services of all kinds, so long as they are provided in a rural, non-profit environment.

If the Commission believes that it must strictly limit discounts to the classes of providers listed in the statute, but agrees that policy considerations support extending the subsidy to other classes as well, YKHC suggests that the Commission consider a broader interpretation of the third listed category: "Local health departments or agencies." That category could readily be interpreted to include any type of health care program or facilities that is operated by a State, local, or tribal government, or under a contract with such a governmental entity. Thus, for example, the Commission could extend the discount to a nursing home operated by YKHC in Bethel under an inter-governmental agreement with the IHS, even if it would not extend the discount to a private, non-profit nursing home in Fairbanks.

Multi-purpose providers should be eligible for discounts.

If the Commission declines to broaden the classes of health-care providers eligible for discounts, YKHC urges the Commission to allow multi-purpose providers to receive them.

As the Commission correctly notes, multi-purpose providers play a vital role in serving remote communities. In many rural areas, and especially in the remote regions of Alaska, the small population and huge operating costs cannot support separate providers for all the area's health needs. Instead, a single entity typically emerges to address all those needs, through a variety of health programs that share fixed and administrative costs to the extent possible. Because such multi-use providers make the most economic and man-power sense in the smallest, remotest, most rural areas of the nation, excluding them from the eligibility for discounts would have the perverse effect of making the discounts less available in the places where they are most needed.

=0C YKHC also notes that Congress may have intended "multi-purpose" entities to be eligible, when it specifically listed "consortia of health care providers" among those eligible under section 254(h)(7). It appears the Commission has interpreted this provision to require that each and every member of the consortium be a provider of one of the types listed in the statute. But the alternate interpretation is equally plausible: that a consortium is eligible for the subsidy if any of its members is a covered provider. This alternative interpretation also avoids making the "consortium" provision redundant: if all members of a consortium are covered providers, then they are already individually eligible for the discount and the "consortium" provision would be pointless.

Requiring multi-purpose entities to pro-rate the discount may be too burdensome on smaller facilities, and inefficient where most of an entity's activities are eligible services. YKHC is still evaluating the discount issue, but suggests the Commission consider exempting small entities or those where a large percentage of the operating budget is devoted to covered services.

## B. Eligible Services

### 1. Internet Access

YKHC supports providing discounts on any form of Internet access, including access on a high-speed broadband basis. Generally, YKHC supports the notion of a percentage discount similar to that for schools and libraries. Like the schools and libraries discount, the health care

provider discount should depend upon the provider's relative dependence on Internet services. Among other factors, YKHC urges the Commission to consider the level of unmet health care need in the vicinity, whether the provider is connected by road to an appropriate tertiary care facility, whether the provider is located on Indian or Alaska Native lands, whether the provider's facility or geographic area has been designated as a health manpower shortage area, and the relative cost of Internet access.

To ensure that the Internet discount does not consume too much of the annual cap, YKHC suggests that a cap be placed on this aspect of the subsidy, with priority within the cap going to those providers awarded the highest discount percentage.

## 2. Services Necessary for the Provision of Health Care

The Commission's interpretation of "necessary for the provision of health care services" is a reasonable one that would be difficult to improve without interfering with the effectiveness of the program. YKHC recommends that the Commission continue to interpret that provision to mean "reasonably related to the provision of health care services or instruction ."

YKHC understands the Commission's concern about ensuring the eligible entities limit their use of the subsidized services to covered activities and believes that the provider certification currently required by the Commission will generally be sufficient. A somewhat more protective alternative would require recipients to keep a log of their usage and to refund part of the subsidy if the non-complying use exceeds a certain level, e.g. 10%. Chronic non-compliance could result in a penalty, perhaps a lower discount rate for some period of time.

## C. Calculation of Discounted Services

### 1. Interpretation of Similar Services

YKHC strongly supports moving to a "functionally equivalent" comparison of urban and rural services, rather than comparing technically similar services. Many rural areas of Alaska are served exclusively by satellite communications, while urban areas have access to fiber, copper and wireless solutions. Latency and other satellite issues create a need for higher bandwidth or unique software solutions. The high cost of additional hardware, software, maintenance, and training to utilize the telecommunications equipment may still make the 'similar service' unattainable to small rural clinics. The "functionality of service" approach would help alleviate this disparity by allowing the Commission to provide support to rural health providers when they are forced to use more expensive technology to achieve the same result as their urban counterparts.

YKHC suggests that, when the Commission determines what services are similar and what their respective rates are, it take care to include all of the things that are necessary to use and benefit from the service (such as additional hardware, software, maintenance, and training to utilize the telecommunications equipment). Bundling these services, as well as Internet services, can provide a major cost savings both to the USF portion of the telecommunication cost and to the rural provider portion of the telecommunication cost. Bundling also promotes vendor and carrier neutrality.

## 2. Urban Area

YKHC agrees that small "cities" of 50,000 people are not sufficiently urban or competitive to provide an appropriate baseline for rates. In fact, using the nearest 50,000 person community for rate comparison has the perverse effect of making discounts less available to providers who live in predominantly rural areas. The statute can readily be interpreted to permit the Commission to use any city in a State for the baseline.

Although 47 U.S.C. section 254(h)(1)(A) requires support levels sufficient to ensure that "rates [for rural health care providers] are reasonably comparable to rates charged for similar services in urban areas of the State," it would undermine the purpose of the statute to limit the comparison to an area within a given state even if no area of the state can reasonably be described as "urban." In states where there is no truly "urban" area, YKHC believes it may be permissible to ensure the rate is comparable to the nearest urban area even if it is not actually within the same state as the provider.

## 3. Maximum Allowable Distance

The Maximum Allowable Distance requirement should be eliminated. As the Commission observed in its Notice regarding this rulemaking, the MAD requirement interferes with the establishment of networks with the most effective partners, and creates unnecessary expense for members of consortia.

In Alaska, for example, Anchorage is the only city having a population of at least 50,000. However, effective delivery of health care services to IHS beneficiaries across the State requires not only linking the smaller communities to Anchorage, but also linking the smaller communities to each other. Given Anchorage's central location in the State, the MAD will often be exceeded if smaller communities on each side of Anchorage are linked together. This would frustrate the coordinated delivery of health benefits in Alaska, and the effective use of telecommunications services.

Problems created by MAD may be even more serious in other parts of Indian Country. In Alaska, it happens that the only tertiary hospital operated for the benefit of American Indians and other IHS beneficiaries is also in the only city with a population over 50,000 (ANMC, in Anchorage). But in other parts of Indian Country, the nearest IHS- or tribally-operated hospital may not be in the nearest city of that size. Thus, in some parts of Indian Country, consultations with the appropriate IHS-system provider will almost always be at distances exceeding the MAD.

Should the Commission decide to modify the MAD, rather than completely eliminate it, the special needs of IHS and its affiliated tribal providers should be taken into account. For example, if the MAD is modified to be the distance between the provider and the nearest tertiary care facility, this would perpetuate the problem mentioned above, where the nearest tertiary care facility to a tribal clinic might not be IHS- or tribally-operated. A modification of MAD should take into account the distance between a tribal clinic and the nearest IHS- or tribally-operated tertiary care facility.

YKHC also supports eliminating the Standard Urban Distance (SUD) rule. The rule would seem to make little sense once the MAD is eliminated. More fundamentally, the rule fails to recognize that a rural provider has a very different level of need even for short-distance telecommunications than an urban provider does. While urban providers do not generally have to use telecommunications services to serve their patients, rural providers often do. For example, a Community Health Aide in a village that is close to Bethel, but unconnected to it by road, can't just walk down the hall to get advice or a consult from her supervising physician or a mid-level practitioner. Instead, she may have to call her supervisor several times a day, just to provide the most basic level of health service to her patients.

#### D. Other Changes

##### 1. Streamlining the Application Process

YKHC recommends that the Commission streamline its application process by eliminating unnecessary and duplicative forms. In particular, YKHC suggests combining forms 466, 467 and 468 into one form. This will reduce the number of forms for applicants by half. The 465 should continue to be the application form. When application is approved, USAC can provide a letter to proceed. After the rural healthcare applicant solicits bids and selects a carrier/vendor, they could jointly submit the final form.. Once installation is completed, the initial bill and copy of contract could be submitted to USAC as proof for payment. The applicant remains responsible for following procurement policies and retaining documentation of RFP and selection process.

##### 2. Pro-Rata Reductions if Annual Cap Exceeded

YKHC would like to discourage the Commission from adopting a straight pro rata reduction if there are insufficient funds for all eligible participant s. Rather, there should be several tiers of support, depending on an area's relative dependence on telecommunications and telemedicine services. The factors that should be considered in assigning providers to a given "tier" should include those we discussed above on the subject of Internet services: the level of unmet health care need in the vicinity, whether the provider is connected by road to an appropriate tertiary care facility, whether the provider is located on Indian or Alaska Native lands, whether the provider's facility or geographic area has been designated as a health manpower shortage area, and the relative cost of services without the subsidy.

##### 3. Preventing Waste, Fraud, and Abuse

###### a. Competitive Bidding

The competitive bidding requirement has proven very helpful in generating a wide array of creative solutions. YKHC recommends expanding this practice and opening the process to vendors other than LECs and LDCs) to facilitate even more unique and cost effective solutions.

###### b. Ensuring Selection of Cost-Effective Services

YKHC asks that the Commission exercise caution in using 'cost effective' terminology because it often results in sacrificing quality for cost

savings. What may be 'cost effective' over the short term may be cost neutral or, even cost inefficient, over the long term. Worse still, it may hamper the provider's ability to benefit from the services. For example, if the quality of a transmission is poor, it may cause treatment delays, user frustration, and discourage providers from fully using the service. It could also cause mis-diagnosis and ineffective or harmful treatment for patients.

#### c. Encouraging Partnerships with Clinics, Schools and Libraries

Partnership with healthcare entities, schools and libraries is crucial to the success of this program. The Commission can further encourage collaborative arrangements through matching the rules for e-Rate and RHC programs. In addition, the Commission could allow the use of these telecommunication highspeed access lines for education before and after normal working/school hours for distance education. One solution may be to include 802.11 (a-g) wireless solutions within small communities. Even though this wireless transmission is not within the FCC regulated space, it is a valuable solution for connecting providers, students and educators from their homes or other suitable locations.

#### E. Effect on Demand for Support

It is to be hoped that changes to the support mechanism will increase its usage, in order to better achieve Congress's universal service goals. However, should the demand exceed the available funding, YKHC suggests that the Commission adopt a tiered system, that sets discount rates in accordance with a community's level of unmet health care need, its relative reliance on telemedicine, and the availability of other alternatives.

In closing, we again thank you for the opportunity to provide these comments, and encourage you to consult with Indian tribes and tribal organizations as you continue to analyze these issues, which are of great importance to improving the health care status in Indian Country.

Respectfully submitted,

SONOSKY, CHAMBERS, SACHSE,  
MILLER & MUNSON

By: Kay E. Maassen Gouwens

KEMG:alm  
cc: Judith Boley Herman, FCC  
Jeanette Thornton, OMB Desk Officer  
Qualex International

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